UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Sean Crawford

Debtor

Anne Crawford

Co-Debtor

SN Servicing Corporation as servicer

for U.S. Bank Trust National

Association, as Trustee of Dwelling

Series IV Trust

v.

Sean Crawford Anne Crawford Kenneth E. West

Respondents

CASE NO.: 23-10866-pmm

CHAPTER 13

Judge: Patricia M. Mayer

Hearing Date: May 9, 2024 at 11:00AM

Objection Deadline: April 29, 2024

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY

PLEASE TAKE NOTICE, that SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Dwelling Series IV Trust (on behalf of itself and together with any successor and/or assign "Movant"), filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay pursuant to 11 U.S.C. § 362 (d)(1) with respect to the property located at 1320 72nd Avenue, Philadelphia, PA 19126.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before April 29, 2024 you or your attorney must do all of the following:
 - (a) file an answer explaining your position at
 United States Bankruptcy Court
 Eastern District of Pennsylvania
 Robert N.C. Nix, Sr. Federal Courthouse
 900 Market Street, Suite 400
 Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Lauren Moyer Friedman Vartolo, LLP 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 Phone: (212) 471-5100 Fax: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Judge Patricia M. Mayer at Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Philadelphia, PA 19107 on May 9, 2024 at 11:00AM, unless otherwise ordered by the Court.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: April 12, 2024

By: <u>/s/ Lauren Moyer</u> Lauren Moyer, Esq. FRIEDMAN VARTOLO LLP

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TO:

Sean Crawford 1320 72nd Avenue Philadelphia, PA 19126 Bankruptcy Debtor

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Kenneth E. West 1234 Market Street, Suite 1813 Philadelphia, PA 19107 Bankruptcy Trustee

United States Trustee Robert N.C. Nix Federal Building - Suite 320, 900 Market Street Philadelphia, PA 19107 United States Trustee